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September 11, 2007

Mr. Michael Berkhoff
Remedial Project Manager
U.S. Environmental Protection Agency - Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604

Subject: Supporting Information for the Preliminary Estimate of the Potentially Available Airspace at the 12th Street Landfill, Otsego Township, Michigan

Dear Michael:

As you requested, Weyerhaeuser Company (Weyerhaeuser) is providing additional information to clarify the bases for its preliminary estimate of the potentially available airspace at the 12th Street Landfill. The attached table, which was developed by RMT, Inc., supplements the information provided in my August 30, 2007, letter to you. The table presents additional details about the numerical assumptions and procedures that were used to estimate the potentially available airspace. As shown in the table, of an estimated 56,200 cubic yards (CY) of airspace created through reshaping the landfill, approximately 40,100 CY would be filled as part of the grading work and another 3,200 CY of material that is currently outside the landfill would be relocated into the landfill, as required by the Record of Decision (ROD) for this site (total of 43,300 CY). Consistent with my earlier correspondence on this subject, RMT's evaluation establishes an excess capacity (i.e., available airspace) of approximately 12,900 CY following completion of the work required by the ROD.

An additional 20,800 CY of airspace (to a total of up to 33,700 CY) may be available based on additional field observations and/or geotechnical information that would allow for certain assumptions to be refined (e.g., slope-specific residual/soil physical parameters and depth of fill along the southern limits of the landfill).

Please contact me, Linda Hicken or Jim Hutchens at RMT, Inc., if you have any questions.

Sincerely,

Weyerhaeuser Company

A handwritten signature in cursive script that reads "Jennifer Hale".

Jennifer Hale
Environmental Manager

cc: Paul Bucholz
Sam Chummar
Jim Saric
Eileen Furcy
John Gross
Joe Jackowski
Martin Lebo
Mark Schneider
Kathy Huibregtse
Linda Hicken
Jim Hutchens

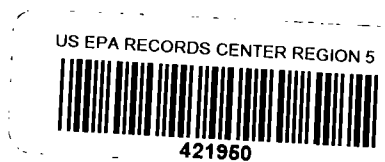


Table 1
Summary of Supporting Information Used To Estimate the Potentially Available Airspace at the 12th Street Landfill
Otsëgo Township, Michigan

	VOLUME (cubic yards)	BASIS
Estimated Available Airspace From Regrading the Landfill	16,100	<p>This is the <u>net cut/fill</u> volume calculated using the <i>InRoads Site</i> digital terrain model by Bentley Systems, Inc. The model was used to determine the cut and fill volumes needed to regrade those portions of the landfill that are within the existing landfill "footprint" on the 12th Street Landfill property, in order to achieve a preliminary grading plan that meets the following objectives:</p> <ul style="list-style-type: none"> ▪ Satisfies the requirements of the Record of Decision for the 12th Street Landfill ▪ Uses existing site information, as available ▪ Incorporates reasonably conservative assumptions as needed ▪ Maximizes available airspace within the footprint of the landfill on the 12th Street Landfill property <p>Weyerhaeuser's August 30, 2007, letter to the U.S. EPA provides details regarding the inputs and key assumptions used in the model.</p> <p>The total estimated available fill volume is 56,200 cubic yards (CY). The total estimated cut volume is 40,100 CY. The net cut/fill volume is 16,100 CY fill. This means that up to approximately 16,100 CY of fill could be added to the landfill, based solely on regrading the landfill to meet the above objectives.</p> <p>Based on the preliminary grading plan, the highest point on the landfill may be approximately 23 feet higher than at present. The location of the highest point would be approximately 200 feet from the river's edge.</p>

Table 1 (continued)
Summary of Supporting Information Used To Estimate the Potentially Available Airspace at the 12th Street Landfill
Otsego Township, Michigan

	VOLUME (cubic yards)	BASIS
<p>Estimates of Material Required by the ROD To Be Relocated To the 12th Street Landfill – <i>These are the estimated volumes of paper residuals/soil/sediment that are currently located either outside of the 12th Street Landfill property (to the east, west, or south) or beyond the footprint of the landfill (to the north). As required by the ROD, these materials will need to be excavated and placed in the landfill. These "cuts" are in addition to the 40,100 CY described above for regrading those portions of the landfill that are on the 12th Street Landfill property. These estimated volumes of material reduce the 16,100 CY of estimated available airspace that could be achieved from regrading the landfill.</i></p>		
a. Wetland north of the landfill	2,500	This is the estimated volume of residuals/soil that may need to be excavated from the wetland area to the north of the landfill (on the 12 th Street Landfill property). It represents an area of approximately 40,000 square feet that is excavated to an average depth of approximately 1.7 feet. The area that may be excavated was primarily based on data obtained by the U.S. EPA during its 2003 predesign investigation, and on an assumed cleanup criterion of 4 mg/kg PCBs.
b. MDNR property	100	This is the estimated volume of residuals/soil that may need to be excavated from the State of Michigan's property to the south of the 12 th Street Landfill. It represents an area of approximately 2,300 square feet that is excavated to an average depth of approximately 1.2 feet. The area that may be excavated is based on the removal of all visually apparent paper residuals, regardless of the potential presence of PCBs. The volume was calculated primarily using data obtained by the U.S. EPA as part of its 2003 predesign investigation.
c. Quarry property	100	This is the estimated volume of residuals/soil that may need to be excavated from the quarry property to the southwest of the 12 th Street Landfill. It represents an area of approximately 2,300 square feet that is excavated to an average depth of approximately 1.2 feet. The area that may be excavated is based on the removal of all visually apparent paper residuals, regardless of the potential presence of PCBs. The volume was calculated primarily using data obtained by the U.S. EPA as part of its 2003 predesign investigation.
d. Powerhouse channel	500	This is the estimated volume of residuals/sediment that may be removed from the former powerhouse discharge channel as part of the Emergency Action currently being conducted by Weyerhaeuser.

Table 1 (continued)
Summary of Supporting Information Used To Estimate the Potentially Available Airspace at the 12th Street Landfill
Otsego Township, Michigan

	VOLUME (cubic yards)	BASIS
Estimated Total Volume of Material Required by the ROD To Be Relocated to the 12th Street Landfill	3,200	This is the sum of Items a through d above.
Estimated Net Available Airspace in the 12th Street Landfill	12,900	This is the estimated excess capacity of the landfill following regrading of the landfill to satisfy the requirements of the ROD (16,100 CY - 3,200 CY = 12,900 CY). As described in Weyerhaeuser's August 30 letter, it may be possible to increase the available airspace of the landfill by up to 20,800 CY based on additional geotechnical information that could be used to refine certain assumptions (to a total of up to 33,700 CY).